

## REMARKS

The Applicant has reviewed and fully considered the December 7, 2007 Office Action received in the above-referenced application.

Claim 3 was objected to as being ambiguous. It has been amended as suggested by the Examiner in the Office Action. Thus this objection has been remedied and the Applicant believes that Claim 3 is now allowable.

Claims 3-6 are rejected under 35 USC 103(a) as being unpatentable over Carlson (U.S. Publication No. 2003/0056623) in view of Stogner (U.S. Patent No. 6,505,531). In order to show a *prima facie* case of obviousness all of the limitations found in the claim being rejected must be present in one or more pieces of prior art. Claim 3 contains the limitation that "the chassis is removably connected to one or more guide columns". Claims 4, 5 and 6 all depend either directly or indirectly from Claim 3. As such they also contain this same limitation. Neither Carlson nor Stogner disclose the limitation of the guide columns being removably connected to the chassis. In fact the Office Action specifically states "...Carlson fails to disclose that the guide columns are removable from the chassis or that a method of disconnecting a pipe length from a pipe string would include a step of disconnecting the guide columns from the chassis."

A review of Stogner does not reveal any disclosure of guide columns removably attached to a chassis. Rather Stogner relies on a hoist and hoisting harness 120 to raise and lower the assembly disclosed therein. The Office Action then goes on to find that the present invention is obvious without providing any support as to how these two pieces of prior art can be combined and suddenly contain the limitation of the guide column being removably mounted to the chassis. Neither of the cited prior art disclose this limitation.

Further Carlson and Stogner teach away from one another. Carlson is directed towards an apparatus used for horizontal directional drilling. Such device is typically used in laying underground pipelines or telecommunication fiber optics whereas Stogner deals with a oil tool used for drilling vertical oil and gas wells. As such the two pieces of prior art are unlikely to be combined.

The teachings of these two pieces of prior art are driven further apart by the fact their construction is significantly different. The vice apparatus 100 in Carlson is supported from underneath by a thrust frame 50. Stogner on the other hand is adjusted from above using a hoist and hoisting harness 120. These basic differences in their construction and operation cause these two pieces of prior art to teach away from one another thus preventing them from being readily combined.

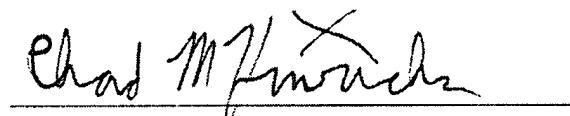
In addition to teaching away from one another Carlson and Stogner also teach away from the present invention in that the present invention relies upon movement along guide columns removably connected to the chassis. This differs significantly from the teaching of Stogner which uses a hoist from above to lift the apparatus. Carlson does not adjust vertically. Rather it moves horizontal along its thrust frame.

Due to the foregoing reasons, it is the Applicant's contention that Claim 3 and its depending claims 4, 5 and 6 are allowable. The Applicant therefore respectfully requests the rejection of Claims 3-6 under 35 USC 103(a) as being unpatentable over Carlson in view of Stogner be withdrawn.

Enclosed is a Request For Continued Examination. Please charge Deposit Account No. 50-1971 the amount of \$405.00 to cover this fee. Further, any additional fees required by this paper or credit any overpayment to Deposit Account No. 50-1971.

Should any other amendments be necessary to place the application in condition for a Notice of Allowance, Examiner Muller is invited to call the undersigned at the below noted telephone number.

Respectfully submitted,



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